

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION

BROOKE PEARCE, as next of friend of §  
U.V., a minor, and JUSTINA GARCIA, §

*Plaintiffs,* §

v. §

Civil Action No. 4:18-cv-3196

FBI AGENT DOE, *in his individual* §  
*capacity,* §

NICHOLAS CHASE CUNNINGHAM; §

SOPHIA PEREZ HEATH; §

JIMMY TONY SANCHEZ; §

DELIA GUALDINA VELASQUEZ; and §

THE UNITED STATES, §

*Defendants.* §

MOTION TO QUASH PLAINTIFFS' CROSS NOTICE DEPOSITIONS

# Government's Exhibit B

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JIMMY TONY SANCHEZ;  
DELIA GUALDINA VELASQUEZ; and  
THE UNITED STATES,

*Defendants.*

**DEFENDANT'S NOTICE OF INTENTION TO TAKE DEPOSITION**

Deponent: Justina Garcia

Date: April 3, 2024

Time: 10:00 a.m. CST

Location: United States Attorney's Office, 1000 Louisiana, Suite 2300, Houston, Texas 77002

Please take notice that at 10:00 a.m. CST on Wednesday, April 3, 2024, at the United States Attorney's Office, 1000 Louisiana, Suite 2300, Houston, Texas 77002, the Defendant will by oral examination take the testimony of the above listed deponent for the purpose of discovery and/or use as evidence in the action before a court, or before some other duly qualified officer, in accordance with Rule 30 of the Federal Rules of Civil Procedure. The deposition will be taken by stenographer and be recorded and will continue until completed.

Respectfully Submitted,

ALAMDAR S. HAMDANI  
United States Attorney  
Southern District of Texas

By: /s/ Ariel N. Wiley  
Ariel N. Wiley  
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ATTORNEY FOR DEFENDANT

**CERTIFICATE OF SERVICE**

I certify that on February 24, 2024, a true and correct copy of the foregoing Notice of Deposition was served by electronic mail to Plaintiff's counsel.

/s/ Ariel N. Wiley  
Ariel N. Wiley  
Assistant United States Attorney